

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

SOUTH HILLS CATHOLIC ACADEMY,

CASE NO. 2:24-cv-00676

Plaintiff,

Electronically Filed & Served

V.

PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES, VALERIE A. ARKOOSH, in her official capacity as Secretary of the Pennsylvania Department of Human Services, OFFICE OF CHILD DEVELOPMENT AND EARLY LEARNING, BUREAU OF CERTIFICATION, SHARON ARABIA, in her official and individual capacities as Acting Director, Office of Child Development and Early Learning, KRISTEN COURT, in her official and individual capacities as a Certification Representative for the Department of Human Services, Office of Child Development and Early Learning, Bureau of Certification, JOYCE PURCELL, in her official and individual capacities as a Certification Representative for Department of Human Services, Office of Child Development and Early Learning, Bureau of Certification, AMY CARNICELLA, in her official and individual capacities as Counsel for Department of Human Services, Office of Child Development and Early Learning, Bureau of Certification, and EUGENE CUCCARESE, in his official and individual capacities as Counsel for Department of Human Services, Office of Child Development and Early Learning, Bureau of Certification.

Defendants.

JOINT STATUS REPORT

AND NOW come the Parties, through their respective counsel, and submit the following Joint Status Report, averring as follows:

1. The previous Joint Status Report filed by the parties in this matter was filed on December 31, 2024 [ECF 28].
2. The parties continue to engage in settlement discussions but have not yet reached a final resolution on all issues. Counsel are meeting on Thursday February 6, 2025 to review the settlement documents and hope to finalize any outstanding issues in February 2025.
3. Accordingly, the Parties are requesting a continuance of the stay and the time for the filing of the Defendants' responsive pleadings for an additional thirty (30) days.
4. On or before February 28, 2025, the Parties will file a Joint Status Report to advise the Court as to whether a hearing is required and Defendants will file their responsive pleading to Plaintiff's Complaint.

WHEREFORE, the Parties respectfully request that the Court accept the foregoing as a Joint Status Report in this matter.

Respectfully submitted,

STRASSBURGER McKENNA
GUTNICK & GEFSKY

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Counsel for Plaintiff

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Plaintiff,

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HUMAN SERVICES, VALERIE A.
ARKOOSH, in her official capacity as
Secretary of the Pennsylvania Department
of Human Services, OFFICE OF CHILD
DEVELOPMENT AND EARLY
LEARNING, BUREAU OF
CERTIFICATION, SHARON ARABIA, in
her official and individual capacities as
Acting Director, Office of Child
Development and Early Learning,
KRISTEN COURT, in her official and
individual capacities as a Certification
Representative for the Department of
Human Services, Office of Child
Development and Early Learning, Bureau of
Certification, JOYCE PURCELL, in her
official and individual capacities as a
Certification Representative for Department
of Human Services, Office of Child
Development and Early Learning, Bureau of
Certification, AMY CARNICELLA, in her
official and individual capacities as Counsel
for Department of Human Services, Office
of Child Development and Early Learning,
Bureau of Certification, and EUGENE
CUCCARESE, in his official and individual
capacities as Counsel for Department of
Human Services, Office of Child
Development and Early Learning, Bureau of
Certification,

Defendants.

CASE NO. 2:24-cv-00676

ORDER

IT IS HEREBY ORDERED by the Court this ____ day of February, 2025, that on or before February 28, 2025, the parties shall file a status report to advise the Court as to whether a hearing is required and Defendants will file their responsive pleading to Plaintiff's Complaint.

BY THE COURT:

_____. J.